

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
)	
Section 68.4(a) of the Commission's Rules)	WT Docket No. 01-309
Governing Hearing Aid-Compatible Telephones)	
)	
Dobson Communications Corporation Petition)	
for Waiver of Section 20.19(c)(2)(i) of the)	
Commission's Rules)	

To: The Commission

**DOBSON COMMUNICATIONS CORPORATION
FURTHER SUPPLEMENT TO PETITION FOR WAIVER
OF SECTION 20.19(c)(2)(i) OF THE COMMISSION'S RULES**

Dobson Communications Corporation ("Dobson") hereby further supplements the above-referenced request for waiver filed on September 8, 2005.¹ Pursuant to the investigation promised in its "Supplement to Petition for Waiver of Section 20.19(c)(2)(i) of the Commission's Rules," filed on September 14, 2005, Dobson has learned that two dual-band Global System for Mobile Communications handset models manufactured by Motorola Inc. ("Motorola"),² which are currently offered by Dobson, were recently certified by a Telecommunications Certification Body as being hearing aid compatible ("HAC") under the Commission's modified performance standard.³ In light of this development, Dobson has

¹ Dobson Communications Corp., Petition for Waiver of Section 20.19(c)(2)(i) of the Commission's Rules, WT Docket No. 01-309 (filed Sept. 8, 2005).

² Dobson Communications Corp., Supplement to Petition for Waiver of Section 20.19(c)(2)(i) of the Commission's Rules, WT Docket No. 01-309 (filed Sept. 14, 2005).

³ See *Cingular Wireless LLC Petition for Waiver of Section 20.19(c)(3)(i)(A) of the Commission's Rules*, WT Docket No. 01-309, *Memorandum Opinion and Order*, FCC 05-166 at ¶ 14 (rel. Sept. 8, 2005). After filing the supplement, Dobson learned that Motorola obtained HAC certification for the V220 and V3 "RAZR" handset models on September 14 and 15, 2005, respectively. Both the Motorola V220 and the V3 are rated M3 for the 1.9

determined that it is in compliance with the Commission's "two HAC handset models per air interface" requirement and hereby amends its petition accordingly.

Nevertheless, Dobson still requires additional time to ensure that its existing HAC handset inventory complies with the Commission's labeling requirements as set forth in Section 20.19(f) of the Commission's rules.⁴ Accordingly, to the extent necessary, Dobson requests a waiver of the labeling requirements for thirty days so that Dobson can obtain and distribute the necessary labeling materials from the manufacturer and/or other "necessary collateral marketing materials" and apply the labeling to the packaging of its existing HAC handset inventory.⁵ Therefore, Dobson requests a thirty day waiver until October 16, 2005 to comply with Section 20.19(f) of the Commission's rules.

Respectfully submitted,

DOBSON COMMUNICATIONS CORPORATION

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September 28, 2005

GHz band. *See* Motorola Inc., Grant of Equipment Authorization, FCC ID No. IHDT56ER1 (V220) (dated Sept. 14, 2005); Motorola Inc., Grant of Equipment Authorization, FCC ID No. IHDT56EU1 (V3) (dated Sept. 15, 2005).

⁴ *See* 47 C.F.R. § 20.19(f); *see also* *Order on Reconsideration*, WT Docket No. 01-309, FCC 05-122 at ¶ 31 (rel. June 21, 2005) (stating that the labeling requirement applies to handset manufacturers but that service providers must ensure that the label is readily visible to individuals with hearing disabilities). Dobson's existing inventory of Motorola V220 and V3 handsets that were obtained prior to HAC certification do not yet have the requisite labeling. While Motorola has developed adhesive labels with U-rating information and an owner's manual addendum that will be included in the packaging of future shipments, Dobson has not yet obtained the adhesive labels through its Motorola handset vendor for application to Dobson's existing inventory. Once the necessary labels are obtained, Dobson will promptly apply them to the packaging of its existing inventory. In the meantime, Dobson will alert its retail personnel to direct hearing impaired customers seeking HAC handsets to the Motorola V220 and V3 handset models.

⁵ *See T-Mobile USA, Inc. Petition for Waiver of Section 20.19(c)(3) of the Commission's Rules*, WT Docket No. 01-309, *Memorandum Opinion and Order*, FCC 05-169 (rel. Sept. 16, 2005).